

Rulemaking Comments

From: Lapinsky, George
Sent: Monday, May 14, 2012 9:34 AM
To: Rulemaking Comments
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As far as regulatory approach, because this and the other recommendations are such extensive issues, I think we should go back to basics and revise the parts of 10CFR50, 52, and 54 that have to do with the Chapter 15 accident analysis and describe to licensees and applicants the additional failures or scenarios that they should address. This new or revised accident analysis will provide the basis for the task analysis that is required for procedures development, training, information and control requirements, and human reliability analysis. This would also provide continuous scenarios from initiation to fuel melt (and beyond) that will provide insights regarding how to best transition from one phase of the accident to another (EOP, SAMG, EDMG, ???). We can still use a cooperative approach with industry groups for the rulemaking piece of it.

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